

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

*In the Matter of:*

Glenclyff Post Office  
Glenclyff, New Hampshire 03238

Docket No. A2012-29

UNITED STATES POSTAL SERVICE  
COMMENTS REGARDING APPEAL  
(December 15, 2011)

On October 20, 2011, the Postal Regulatory Commission ("Commission") received a petition for review postmarked October 19, 2011, from postal customer Helen Maggie Carr on behalf of herself and "a small group of Glenclyff residents" objecting to the discontinuance of the Glenclyff Post Office located in Glenclyff, New Hampshire. Three additional petitions for review followed, from Glenclyff residents Nancy Foote and Charles Foote, and Jean Taggart. On October 28, 2011, the Commission issued Order No. 934, its Notice and Order Accepting Appeal and Establishing Procedural Schedule under 39 U.S.C. § 404(d). Mr. and Ms. Foote, Ms. Taggart, and three others (former Glenclyff Postmaster Philip Belyea, hiker hostel owner John Robblee, and Executive Director of the Appalachian Trail Conservancy David N. Startzell) (collectively, the "Petitioners") filed Form 61 Participant Statements in support of the petitions. Mr. Belyea and Mr. Robblee filed Notices of Intervention, and Mr. Robblee filed supplemental correspondence, also in support of the petitions. In accordance with Order No. 934, the administrative record was filed with the Commission on November 7, 2011.

The correspondence and the Participant Statements received by the Commission raise main three issues: (1) the impact on the provision of postal services, (2) the impact upon the Glenclyff community, and (3) the calculation of economic savings expected to result from discontinuing the Glenclyff Post Office. As reflected in the administrative record of this proceeding, the Postal Service gave these issues serious consideration. In addition, consistent with the Postal Service's statutory obligations and Commission precedent,<sup>1</sup> the Postal Service gave consideration to a number of other issues, including the impact upon postal employees. Accordingly, the determination to discontinue the Glenclyff Post Office should be affirmed.

### **Background**

The Final Determination to Close the Glenclyff, NH Post Office and Establish Service by Rural Route Service ("Final Determination" or "FD"),<sup>2</sup> as well as the administrative record, indicate that the Glenclyff Post Office provides EAS-53 level service to no carrier delivery customers, 52 Post Office Box customers, and retail customers for 36 hours per week.<sup>3</sup> The average number of daily retail window transactions at the Glenclyff Post Office is 12,<sup>4</sup> accounting for 15 minutes of workload

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<sup>1</sup> See 39 U.S.C. 404(d)(2)(A).

<sup>2</sup> The Final Determination can be found at Item No. 47 in the Administrative Record. It is not clearly marked Item No. 47, but it is the 10-page document titled Final Determination to Close the Glenclyff, NH Post Office and Establish Service by Rural Route Service that is found in the Administrative Record between documents marked Item No. 46 and Item No. 48. All citations to the Final Determination will be to "FD at X," indicating the page number of the citation, rather than to Item No. 47. Other items in the administrative record are referred to as "Item No. XX."

<sup>3</sup> FD at 2; Item No. 18, (Form 4920) Post Office Closing or Consolidation Proposal – Fact Sheet ("Fact Sheet"), at 1; Item No. 33, Proposal to Close the Glenclyff, NH Post Office and Establish Service by Rural Route Service ("Proposal"), at 2; Item No. 41 Proposal to Close the Glenclyff, NH Post Office and Establish Service by Rural Route Service (Revised) ("Revised Proposal"), at 2.

<sup>4</sup> Petitioners argue that the Postal Service misrepresents the true number of customers, and the true volume of business handled by the Glenclyff Post Office. This is allegedly due to the Postal Service's

daily.<sup>5</sup> Generally, revenue has been declining: \$11,875 in FY 2008 (31 revenue units); \$13,322 in FY 2009 (35 revenue units); and \$11,342 (30 revenue units) in FY 2010.<sup>6</sup>

The postmaster of the Glenclyff Post Office retired on May 2, 2010.<sup>7</sup> Since the postmaster vacancy arose, an employee from a neighboring office was installed as an officer-in-charge ("OIC") to operate the office. The non-career postmaster relief ("PMR") serving as the OIC may be separated from the Postal Service, although attempts will be made to reassign the employee to a nearby facility.<sup>8</sup>

Upon implementation of the Final Determination, delivery and retail services will be provided by rural route service administered by the Warren Post Office,<sup>9</sup> an EAS-13 level office located 5 miles away, which has 83 available Post Office Boxes.<sup>10</sup> This service will continue upon implementation of the Final Determination.<sup>11</sup>

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failure to consider (1) seasonal business, because it measured these metrics in March 2011, when many residents were visiting warmer locations and before most Appalachian Trail hikers came through Glenclyff, (2) non-Post Office Box holders, and (3) the residents and employees of the Glenclyff Home. According to Item No. 10, Window Transaction Survey, Item No. 11, Survey of Incoming Mail, and Item No. 12, Survey of Dispatched Mail, the Post Office conducted its survey between March 19, 2011 and April 1, 2011. The survey is just a snapshot at a point in time. Sometimes, it will reflect normal activity, and sometimes it may reflect conditions that may affect business traffic, such as extremes in weather conditions that may suppress the figure, or a large gathering or event held in a less populated area, that may increase the overall average. In any event, the daily number of transactions is not the sole factor informing this determination; it is merely one of many facts considered. Furthermore, the revenue trend at the Glenclyff Post Office shows a general downward trend, despite (1) increases in rates, and (2) the alleged additional patronage of non-Post Office Box holders and the residents and employees of the Glenclyff Home. This enables management to assess customer demand and usage on an annualized basis.

<sup>5</sup> FD at 2; Item No. 33, Proposal, at 2; Item No. 41, Revised Proposal, at 2.

<sup>6</sup> FD at 2; Item No. 18, Fact Sheet, at 1; Item No. 33, Proposal, at 2.

<sup>7</sup> Petitioner Belyea alleges that the Postal Service is basing its decision to close the Glenclyff Post Office on the "lame excuse" that he retired as Glenclyff's postmaster, and alleges that he is personally aware of two individuals interested in the job. Put simply, this is not the issue. The Post Office does not claim, and has never claimed, it is basing any portion of its decision to close the Glenclyff Post Office on an inability to fill the postmaster position; it is rather the fact of the vacancy that prompted the Postal Service to conduct a feasibility study, as was appropriate under 39 CFR 241.3.

<sup>8</sup> FD at 9; Item No. 33, Proposal, at 8; Item No. 41, Revised Proposal, at 11.

<sup>9</sup> The Warren Post Office is not an RAO Initiative candidate facility.

<sup>10</sup> FD at 2; Item No. 18, Fact Sheet, at 1; Item No. 33, Proposal, at 2.

<sup>11</sup> FD at 2; Item No. 33, Proposal, at 2.

The Postal Service followed the proper procedures that led to the posting of the Final Determination. All issues raised by the customers of the Glenclyff Post Office were considered and properly addressed by the Postal Service. The Postal Service complied with all notice requirements. In addition to the posting of the Proposal and Final Determination, customers received notice through other means.

Questionnaires were distributed to all Post Office Box customers of the Glenclyff Post Office. Questionnaires were also available over the counter for retail customers at the Glenclyff Post Office.<sup>12</sup> A letter from the Manager of Post Office Operations, Portland, Maine, was also made available to postal customers, which advised customers that the Postal Service was evaluating whether the continued operation of the Glenclyff Post Office was warranted, and that effective and regular service could be provided through rural route service with retail services available at the Warren Post Office. The letter invited customers to complete and return a customer questionnaire and to express their opinions about the service they were receiving and the effects of a possible change involving rural route service.<sup>13</sup> Thirty-one (31) customers returned questionnaires, and the Postal Service responded.<sup>14</sup> In addition, representatives from the Postal Service were available at the Warren Town Hall for a community meeting on May 24, 2011,<sup>15</sup> to answer questions and provide information to customers.<sup>16</sup>

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<sup>12</sup>FD at 2; Item No. 20, Questionnaire Instruction Letter from P.O. Review Coordinator to OIC/Postmaster at Glenclyff Post Office, at 1.

<sup>13</sup> Item No. 21, Letter to Postal Customer from Manager, Post Office Operations ("Letter to Customer"), at 1.

<sup>14</sup> FD at 2; Item No. 22, Returned customer questionnaires and Postal Service response letters.

<sup>15</sup> The Glenclyff Post Office discontinuance action began prior to July 14, 2011. Therefore, it was processed under the Handbook PO-101, *Postal Service-Operated Retail Facilities Discontinuance Guide*,

Customers received formal notice of the Proposal and Final Determination through postings at nearby facilities. The Proposal was posted with an invitation for public comment at the Glenclyff and the Warren Post Offices for 60 days beginning June 14, 2011.<sup>17</sup> Public comments to the Postal Service's Proposal, and the Postal Service's responses to those comments, may be found at Item No. 38. The Final Determination was posted at the same two Post Offices starting on October 5, 2011, as confirmed by the round-date stamped Final Determination cover sheets that appear in the administrative record as Item Nos. 49 and 50.<sup>18</sup>

In light of the postmaster vacancy; a minimal workload; low and decreasing office revenue;<sup>19</sup> the variety of delivery and retail options (including the convenience of rural delivery and retail service);<sup>20</sup> minimal projected population, residential, commercial, or business growth in the area;<sup>21</sup> minimal impact upon the community; and the expected financial savings,<sup>22</sup> the Postal Service issued the Final Determination.<sup>23</sup> Regular and effective postal services will continue to be provided to the Glenclyff community in a cost-effective manner upon implementation of the Final Determination.<sup>24</sup>

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effective at that time.

<sup>16</sup> FD at 2; Item No. 21, Letter to Customer, at 1; Item No. 24, Community Meeting Roster; Item No. 25, Community Meeting Analysis; Item No. 33, Proposal, at 2.

<sup>17</sup> FD at 2; Item No. 36, Round-date stamped proposals and invitations for comments from affected offices, at 1-4.

<sup>18</sup> Item nos. 49 and 50 are not clearly marked in the administrative record. However, they consist of the two consecutive pages between Item Nos. 48 and 51.

<sup>19</sup> See FD at 2; Item No. 18, Fact Sheet, at 1; Item No. 33, Proposal, at 2; Item No. 41, Revised Proposal, at 2.

<sup>20</sup> FD at 10; Item No. 33, Proposal, at 8.

<sup>21</sup> Item No. 16, Community Survey Sheet, at 1.

<sup>22</sup> FD at 9-10; Item No. 18, Fact Sheet, at 1; Item No. 29, Proposal Checklist, at 2; Item No. 33, Proposal, at 8.

<sup>23</sup> FD at 2.

<sup>24</sup> FD at 10.

Each of the issues raised by the various Petitioners is addressed in the paragraphs which follow.

### **Effect on Postal Services**

Consistent with the mandate in 39 U.S.C. § 404(d)(2)(A)(iii) and as addressed throughout the administrative record, the Postal Service considered the effect of closing the Glenclyff Post Office on postal services provided to Glenclyff Post Office customers. The closing is premised upon providing regular and effective postal services to Glenclyff Post Office customers.

Several Petitioners, in their letters of appeal and in their Participant Statements, raise the issue of the effect on postal services of the Glenclyff Post Office's closing, noting the convenience of the Glenclyff Post Office and requesting its retention. Petitioners contend that rural route service and service through the Warren Post Office will not provide the maximum degree of effective postal services because 1) rural carriers can only provide minimal services; 2) customers are often unavailable (or, in the case of senior citizens or disabled customers, unable) to meet rural carriers at the roadside mailboxes; 3) rural route service is not secure against theft or exposure to adverse weather conditions; 4) the Postal Service failed to tell residents how to receive services such as buying stamps or mailing packages;<sup>25</sup> 5) transacting with the rural carrier can be inconvenient and require multiple trips to the mailbox; 6) it is inconvenient, and potentially unsafe, for hikers on the Appalachian Trail to travel an

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<sup>25</sup> This allegation is inconsistent with the record. The Postal Service repeatedly provided customers with information regarding the sending of packages and purchasing of stamps, as will be seen in Postal Service answers to other customer concerns. This appears throughout the administrative record. See, e.g., FD at 4-6; Item No. 33, Proposal, at 4-5; Item No. 22, Returned customer questionnaires and Postal Service response letters, at 12, 14, 18-19; Item No. 23, Customer Questionnaire Analysis, at 2-3.

extra 5 miles to the Warren Post Office to engage in transactions such as sending and receiving packages, and buying money orders; 7) Postal Service regulations regarding the specifications necessary for a road to receive service may prevent customers from receiving service at mailboxes located near their homes; 8) the weather in Glencliff, New Hampshire makes picking up mail, especially from the Warren Post Office, difficult in the snowy winter season; 9) mail may be delivered later in the day; and 10) because other nearby post offices may close as well. Each of these concerns was considered by the Postal Service.

The Postal Service has considered the impact of closing the Glencliff Post Office upon the provision of postal services to Glencliff customers. FD at 2; Item No. 33, Proposal, at 2. As explained throughout the administrative record, carriers can provide similar access to retail service by performing many functions (at the same time that the carrier delivers the mail) that will prevent any need to visit a Post Office. FD at 10; Item No. 23, Customer Questionnaire Analysis, at 2; Item No. 33, Proposal, at 8. These include several convenient options such as providing Stamps by Mail and Money Order Application forms. FD, at 4-5; Item No. 38, Returned Optional Comment Forms and USPS Response letters, at 5b; Item No. 23, Customer Questionnaire Analysis, at 2; Item No. 33, Proposal, at 4-5. Carrier service is especially beneficial to many senior citizens and those who face special challenges because the carrier can provide delivery and retail services to roadside mailboxes. FD at 3; Item No. 23, Customer Questionnaire Analysis, at 2; Item No. 33, Proposal, at 3. Most transactions do not require meeting the carrier at the mailbox. FD at 4-5, 8; Item No. 23, Customer

Questionnaire Analysis, at 2-3; Item No. 33, Proposal, at 4-5, 7. Special provisions are made, on request, for hardship cases or special customer needs. FD at 3; Item No. 22, Returned customer questionnaires and Postal Service response letters, at 21, 28; Item No. 23, Customer Questionnaire Analysis, at 2; Item No. 33, Proposal, at 3.

The Postal Service also addressed customer concerns about heightened potential for theft of outgoing or incoming mail when switching to carrier delivery. FD at 4; Item No. 22, Returned customer questionnaires and Postal Service response letters, at 12-13; Item No. 23, Customer Questionnaire Analysis, at 2-3; Item No. 33, Proposal, at 4. When customers raised concerns about the safety involved with leaving mail in rural boxes and packages that did not fit in the boxes at people's homes, the Postal Service addressed those concerns. FD at 4, 6; Item No. 22, Returned customer questionnaires and Postal Service response letters, at 12-13; Item No. 23, Customer Questionnaire Analysis, at 2-3; Item No. 33, Proposal, at 4. More specifically, the Postal Service explained that customers can add locks to their rural boxes and that customers could call the administrative Post Office for pickup of packages that did not fit in the boxes, which then could be left safely outside the individual's home if he or she lived within a half mile of the boxes but was not home. FD at 4, 6; Item No. 22, Returned customer questionnaires and Postal Service response letters, at 12-13; Item No. 23, Customer Questionnaire Analysis, at 2-3; Item No. 33, Proposal, at 4. Additionally, customers retain the option of maintaining a Post Office Box at the Warren Post Office. FD at 4; Item No. 33, Proposal, at 4; Item No. 23, Customer Questionnaire Analysis, at 3; Item No. 22, Returned customer questionnaires and Postal Service



response letters, at 13. Scheduling package pickup and utilizing Post Office Boxes should alleviate many weather issues as well. These options should largely resolve the security and weather concerns that the customers raised.

Moreover, the Postal Service contacted the Warren Police Department concerning reports of mail theft or vandalism in the Glencliff area. The Town Administrator found no such reports. Item No. 14, Inspection service/local law enforcement vandalism reports, at 1-2; Item No. 15, Post Office Survey Sheet, at 1. Thus, there appears to be minimal risk that the security of the customers' mail will be impacted by the closing of the Glencliff Post Office.

Petitioners also argue that engaging in transactions with rural carriers can be inconvenient and involve multiple trips to the mailbox for both customer and carrier. Upon implementation of the Final Determination, customers will be able to obtain stamps, money orders, and special services such as certified, registered, Express Mail, delivery confirmation, signature confirmation, and COD through the rural carrier. FD at 2-4; Item No. 33, Proposal at 2, 4-5. Contrary to Petitioner's assertions that it will be inconvenient for customers to request and receive special services from the rural carrier, see, e.g., Participant Statement of Philip Belyea at 2, customer convenience may be enhanced upon implementation of the Final Determination because the provision of rural carrier service will alleviate the need for customers to travel to the Post Office for retail services and will provide them with 24-hour access to their mail. FD at 2-5; Item No. 33, Proposal at 2, 4-5.

This is especially true for senior citizens and disabled customers. FD at 3; Item No. 33, Proposal, at 3. Moreover, the Postal Service makes special provisions for hardship cases and special customer needs. FD at 3; Item No. 33, Proposal, at 3. Additionally, the Postal Service has informed the Petitioners that rural carriers strive to provide service at the earliest possible hour and arrive at mailboxes at about the same time each day. FD at 3-4; Item No. 33, Proposal, at 3; Item No. 22, Returned customer questionnaires and Postal Service response letters, at 32.

Petitioner Belyea, in his Participant Statement, criticizes the need to make two trips to undertake certain transactions. The Postal Service addressed the issue of complicated transactions, such as the mailing of heavy packages, throughout the administrative record. FD at 3; Item No. 33, Proposal, at 3; Item No. 22, Returned customer questionnaires and Postal Service response letters, at 19; Item No. 23, Customer Questionnaire Analysis, at 3. Although this process does involve the carrier obtaining the package/payment and leaving a receipt on two different days (and the customer leaving the package and obtaining a receipt on two different days), it does not require any extra trips beyond those that the carrier and the customer already make to the mailbox to deliver and retrieve mail anyway. The Postal Service strives to provide excellent service to its customers, and any deficiencies with that service should be brought to the attention of the postmaster of the Warren Post Office, which will oversee service to Glenclyff customers. On balance, the Postal Service maintains that rural carrier service will provide similar service for most retail transactions to customers currently served by the Glenclyff Post Office. FD at 2.

Petitioners particularly stress the needs of hikers on the Appalachian Trail as a reason to keep the Glenclyff Post Office open. They note the popularity of the Glenclyff Post Office among hikers; the 10 mile round trip necessary to visit the Warren Post Office; and list the many needs of hikers in this portion of the Appalachian Trail, including the need to send mail and packages, to receive packages that contain food and weather-appropriate clothing, and the need to buy money orders. Petitioners also point out the danger of hikers being hit by motor vehicles while traveling to Warren.

The Postal Service addressed the issue of Appalachian Trail hikers on numerous occasions in the administrative record. FD at 2, 6; Item No. 33, Proposal, at 2, 6; Item No. 22, Returned customer questionnaires and Postal Service response letters, at 25, 29-30; Item No. 23, Customer Questionnaire Analysis, at 2; Item No. 38, Customer comments and Group correspondences and Postal Service response letters, at 7b-8b. As the Postal Service made clear, the Appalachian Trail is a national treasure of which we can all be proud. The Postal Service is aware of and is sympathetic to the needs of its customers.

However, the Postal Service is a self-supporting government enterprise, and the only delivery service that reaches every address is the nation – 150 million residences, businesses, and Post Office Boxes. The Postal Service receives no tax dollars for operating expenses, and relies on the sale of postage, products and services to fund its operations. According to Whiteblaze.net, the Glenclyff Post Office is one of 128 post offices along the Appalachian Trail.<sup>26</sup> Several of these post offices are more than 10

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<sup>26</sup> See <http://www.whiteblaze.net/forum/content.php?56>

miles – *one way* – from the trail, and at least one post office is 25 miles distant.<sup>27</sup> Yet they are still considered “on” the trail.<sup>28</sup>

The Postal Service is proud to provide a vital service to Appalachian Trail hikers. However, the entire administrative record must be taken into consideration when making a final determination. The argument that hikers on the Appalachian Trail, many of whom are hiking over 2,000 miles over a period of months on their trek, cannot walk 5 miles each way, to and from Warren, New Hampshire – a four hour undertaking – to make an allegedly “crucial” visit to the post office is unconvincing. In numerous other locations these same hikers must walk 10 miles, or more, one way for the same service.<sup>29</sup> The Postal Service’s Final Determination does not cause these customers any undue hardship. Of course, hikers should use as much caution while walking along New Hampshire roads as they do on the Appalachian Trail itself.

Petitioners argue that Postal Service regulations regarding the eligibility of roads for delivery service might mean some customers cannot have mail delivered to mailboxes situated on the road that runs by their dwelling. It is true that the Postal Service has several guidelines that must be met prior to a road being approved for delivery. FD at 7-8; Item No. 33, Proposal, at 6. The road to be traveled must be at least 14 feet wide and maintained at all times of the year. It cannot dead end in a private driveway even if the drive is maintained by a municipality. There must be a suitable turning point provided for the carrier, preferably with no backing. If backing is

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<sup>27</sup> See id. (emphasis added)

<sup>28</sup> See id.

<sup>29</sup> See id.

involved, there are other guidelines to adhere to. If backing is necessitated, the Postmaster must verify it is in a low-traffic area and there are no children in the immediate vicinity on a regular basis. There must also be a minimum of one family per one-half mile of travel. FD at 7-8; Item No. 33, Proposal, at 6.

These regulations are necessary for the Postal Service to provide maximum service in an economically efficient fashion, and, more importantly, for the safety of the carrier and pedestrians. The Postal Service is committed to providing excellent service to its customers. A vast majority of Glenclyff customers appear to reside along their rural route carrier's line of travel and thus will not encounter this issue. For those few that do not live along the carrier's line, it appears that they live on roads that adjoin a main road along the carrier's line of travel. These customers will need to place their mailboxes along the main road for delivery.

It is possible that certain Glenclyff customers who do not receive rural route delivery along the road they live on may qualify to receive free use of a Post Office Box under Postal Service regulations. This may be true if it is determined, among other things, that the carrier does not deliver the customer's mail "at or near [the customer's] physical address," as defined for carrier delivery in the Glenclyff locale. If this is the case, a customer may apply to receive use of a Post Office Box at no charge. Of course, customers may still choose to maintain a Post Office Box in the Warren Post Office, at their own expense, if they fail to qualify for a free Post Office Box. FD at 4; Item No. 33, Proposal, at 4; Item No. 23, Customer Questionnaire Analysis, at 3; Item No. 22, Returned customer questionnaires and Postal Service response letters, at 13.

Petitioner Robblee argues in his Participant Statement that New Hampshire's "harsh and long snow-laden winters" hamper Glenclyff residents' ability to travel to other towns to visit a Post Office. While the Postal Service recognizes there may be some difficulties during inclement weather, it reiterates what it has shown throughout the administrative record: carriers can perform many functions (at the same time that the carrier delivers the mail) that will prevent any need to go to a post office. FD at 10; Item No. 23, Customer Questionnaire Analysis, at 2; Item No. 33, Proposal, at 8. These include several convenient options such as providing Stamps by Mail and Money Order Application forms. FD, at 4-5; Item No. 38, Returned Optional Comment Forms and USPS Response letters, at 5b; Item No. 23, Customer Questionnaire Analysis, at 2; Item No. 33, Proposal, at 4-5. Carrier service is especially beneficial to many senior citizens and those who face special challenges – particularly in winter – because the carrier can provide delivery and retail services to roadside mailboxes. FD at 3; Item No. 23, Customer Questionnaire Analysis, at 2; Item No. 33, Proposal, at 3. Most transactions do not require meeting the carrier at the mailbox. FD at 4-5, 8; Item No. 23, Customer Questionnaire Analysis, at 2-3; Item No. 33, Proposal, at 4-5, 7. Special provisions are made, on request, for hardship cases or special customer needs. FD at 3; Item No. 22, Returned customer questionnaires and Postal Service response letters, at 21, 28; Item No. 23, Customer Questionnaire Analysis, at 2; Item No. 33, Proposal, at 3.

Additionally, the Postal Service has assured rural route service customers throughout the administrative record that it is committed to getting mail service to them even in inclement weather. FD at 3, 7; Item No. 33, Proposal, at 3, 6. Not only does the Postal Service and its carriers have a long history of reliable delivery even in prolonged periods of extreme weather, but the Postal Service requires its carriers to provide a vehicle of adequate size, equipped with the necessary equipment (chains or snow tires, warning lights or signs, etc.) to serve the route safely and efficiently, and in accordance with federal, state, and local motor vehicle laws and regulations. FD at 3, 7; Item No. 33, Proposal, at 3, 6.

Petitioners also question whether the rural route carrier will deliver late in the day. The record explains, however, that Postmasters monitor mail volume to determine the route that allows the greatest amount of mail to be delivered at the earliest possible hour. FD at 3-4; Item No. 22, Returned customer questionnaires and Postal Service response letters, at 22; Item No. 23, Customer Questionnaire Analysis, at 3; Item No. 33, Proposal, at 3. Further, the Postal Service took into consideration the additional work load for the carrier service and does not expect any delays in delivery times. FD at 10 (workload has declined and rural route service will be regular and effective); Item No. 33, Proposal, at 8 (same).

Finally, Petitioner Taggart, in both her appeal and Participant Statement, makes vague reference to “other potential nearby post office closings” as rationale for keeping the Glenclyff Post Office open. If a proposal were to be made to close a nearby post office at a future time, the customers of that post office would have notice and an

opportunity to comment on such a closing before a final determination would be made. Therefore, because nearby post offices, including the Warren Post Office, are still operating and because the customers of Glencliff will also have access to many postal services through rural route service if the Glencliff Post Office is closed, the effective provision of postal services to Glencliff customers will not be significantly impacted.

Upon the implementation of the Final Determination, delivery and retail services will be provided by rural route service emanating from the Warren Post Office. In addition to rural delivery, which is the recommended alternate service, customers may also receive postal services at the Warren Post Office, which is located approximately 5 miles away. The window service hours of the Warren Post Office are from 7:30 a.m. to 1 p.m. and 2:30 p.m. to 5 p.m., Monday through Friday, and from 7:30 a.m. to Noon on Saturday. FD at 2; Item No. 33, Proposal, at 2. Furthermore, the special attention and assistance provided by the personnel at the Glencliff Post Office will be provided by personnel at the Warren Post Office and from the carrier. FD at 2; Item No. 33, Proposal, at 2. Thus, the Postal Service has properly concluded that all Glencliff customers will continue to receive regular and effective service via rural route delivery.

### **Effect Upon the Glencliff Community**

The Postal Service is obligated to consider the effect of its decision to close the Glencliff Post Office upon the Glencliff community. 39 U.S.C. § 404(d)(2)(A)(i). While the primary purpose of the Postal Service is to provide postal services, the statute recognizes the substantial role in community affairs often played by local Post Offices,



and requires consideration of that role whenever the Postal Service proposes to close or consolidate a Post Office.

Glenclyff, New Hampshire, is an unincorporated rural community located in Grafton County. FD at 8; Item No. 16, Community Fact Sheet, at 1; Item No. 33, Proposal, at 7. The community is administered politically by the Selectboard of Warren, New Hampshire, and Warren also provides police protection. FD at 8; Item No. 16, Community Fact Sheet, at 1; Item No. 33, Proposal, at 7. Fire protection is provided by the Warren Volunteer Fire Department. FD at 8; Item No. 16, Community Fact Sheet, at 1; Item No. 33, Proposal, at 7. The questionnaires completed by Glenclyff customers indicate that, in general, the retirees, farmers, commuters, and others who reside in Glenclyff must travel elsewhere for other supplies and services. *See generally* FD at 8; Item No. 33, Proposal at 7; Item No. 22, Returned customer questionnaires and Postal Service response letters.

Petitioners' letters of appeal and Participant Statements raise the issue of the effect of closing the Glenclyff Post Office upon the Glenclyff community. More specifically, Petitioners contend that the Glenclyff Post Office, which has had a continuous presence in the town, plays an important role in the community by providing a place for a public bulletin board and community gatherings. These issues were extensively considered by the Postal Service, as reflected in the administrative record. FD at 8-9; Item No. 22, Returned customer questionnaires and Postal Service response letters, at 15-16, 33; Item No. 23, Customer Questionnaire Analysis, at 2-5; Item No. 25, Community Meeting Analysis, at 2; Item No. 33, Proposal at 7. There is a community

bulletin board available at the Warren Post Office. FD at 3; Item No. 23, Customer Questionnaire Analysis, at 2; Item No. 33, Proposal, at 3. Also, Glenclyff residents may continue to meet, socialize, share information at other Glenclyff locations, such as the Willing Workers Hall and residences in town. FD at 8-9; Item No. 23, Customer Questionnaire Analysis, at 4-5; Item No. 25, Community Meeting Analysis, at 2; Item No. 33, Proposal, at 6.

Furthermore, Petitioners express concern about losing their village name and ZIP Code. The Postal Service explained that a community's identity derives from the interest and vitality of its residents and *their* use of its name. The record makes clear that the Postal Service is addressing this concern through preservation of the community identity by continuing the use of the Glenclyff name and ZIP Code in the addresses of Glenclyff residents who continue to utilize Post Office Box service at the Warren Post Office. FD at 8-9; Item No. 38, Returned Optional Comment Forms and USPS Response letters, at 3b; Item No. 23 Customer Questionnaire Analysis at 3; Item No. 25, Community Meeting Analysis at 1.

Communities generally require regular and effective postal services and these will continue to be provided to the Glenclyff community. Rural carrier service is expected to be able to handle any future growth in the community. FD at 2; Item No. 33, Proposal, at 2. In addition, the Postal Service has concluded that non-postal services provided by the Glenclyff Post Office can be provided by the Warren Post Office. Government forms usually provided by the Post Office are also available by contacting local government agencies. FD at 8; Item No. 33, Proposal, at 7.

Additionally, as already explained above in response to Petitioners' concerns about whether effective service will be provided to senior citizens and those needing additional assistance, the Postal Service considered the impact of the closing of the Post Office on those individuals. The Postal Service explained that services provided at the Glenclyff Post Office will be available from the carrier. Carrier service is beneficial to many senior citizens and others because the carrier can provide delivery and retail service to roadside mailboxes or cluster box units. Customers do not have to make a special trip to the post office for service. Most transactions do not require meeting the carrier at the mailbox. Special provisions are made, on request, for hardship cases or special customer needs. Stamps by Mail and Money Order Application forms are available for customer convenience. FD at 4-5; Item No. 23, Customer Questionnaire Analysis, at 3-4; Item No. 25; Item No. 33, Proposal, at 4-5.

Thus, the Postal Service has met its burden, as set forth in 39 U.S.C. § 404(d)(2)(A)(i), by considering the effect of closing the Glenclyff Post Office on the Glenclyff community.

### **Economic Savings**

Postal officials also properly considered the economic savings that would result from the proposed closing, as provided under 39 U.S.C. § 404(d)(2)(A)(iv). The Postal Service estimates that rural route service would cost the Postal Service substantially less than maintaining the Glenclyff Post Office, and would still provide regular and effective service. FD at 9-10; Item No. 33, Proposal, at 8. The estimated annual savings associated with discontinuing the Glenclyff Post Office are \$27,171. FD at 10;

Item No. 33, Proposal, at 8. Economic factors are one of several factors that the Postal Service considered, and economic savings have been calculated as required for discontinuance studies, which is noted throughout the administrative record and consistent with the mandate in 39 U.S.C. § 404(d)(2)(A)(iv). FD at 9-10; Item No. 33, Proposal, at 8.

Petitioner Charles Foote, in his Participant Statement, alleges that the Postal Service has “failed to provide a real dollar figure on the cost benefits from closing our Post Office.” The record is to the contrary. The Postal Service has provided a dollar figure for the money it will save by closing the Glenclyff Post Office: \$27,171. FD at 9-10; Item No. 33, Proposal, at 8.

Also, the Postal Service “showed its work” in the administrative record, both providing its calculations regarding its savings in the Proposal and Final Determination, and breaking down the additional cost for increased carrier service in its Alternative service options/cost analysis. FD at 9; Item No. 33, Proposal, at 8; Item No. 17, Alternative service options/cost analysis, at 2. In fact, the Postal Service’s estimate of the cost of replacement service is conservative because it assumes that each of the 52 Glenclyff Post Office Box customers will elect to receive rural route service, an unlikely event. FD at 9; Item No. 33, Proposal, at 8; Item No. 17, Alternative service options/cost analysis, at 2. The responsible Postal Service personnel are well versed in the costs of replacement service and relied upon their experience to make the calculations here. The Postal Service has every reason to believe that the calculations

in the record are accurate,<sup>30</sup> and the Petitioner does not provide a reason to believe otherwise.

Petitioner Taggart's letter of appeal and Participant Statement suggests various strategies that she thinks would reduce costs for the Postal Service while avoiding the elimination of the Glenclyff Post Office. She suggests alternatives such as shorter hours for the Post Office, the use of part-time workers, and a reduction in pay for existing employees. The Postal Service has broad experience with and has considered similar options, including implementing some of those options and asking Congress for permission for others. However, it must also recognize its obligation to maintain postal facilities in conformity with reasonable economies of postal operations while maintaining ready access to essential postal services. Moreover, the Postal Service is only required to demonstrate that the closure of the specific Post Office under review will satisfy the criteria set forth in § 404(d). In this case, the Postal Service has determined that rural route service is the most cost-effective solution for providing regular and effective service to the Glenclyff community.

In their Participant Statements, Petitioners Taggart, Belyea, and Nancy Foote challenge the Final Decision on the grounds that the Glenclyff Post Office loses less money than other post offices and that the amount of money saved by closing the Glenclyff Post Office will be small, especially when compared to the Postal Service's debt. While the amount saved by closing the Glenclyff Post Office may seem insignificant to the Petitioners, it is significant to the overall cost reduction focus of the

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<sup>30</sup> This calculation is very much in line with similar calculations in other recent discontinuance cases.

Postal Service. The Postal Service is looking at all opportunities to operate more efficiently and provide effective and regular service. While the savings from any given initiative may seem small, these savings can make a difference when added together.

Petitioners question the consistency of this proposal with provisions of Title 39, U.S. Code. Pursuant to 39 U.S.C. § 404(d)(2)(A)(iii), the Postal Service in determining whether to close a Post Office must consider whether such closing is consistent with the policy that the Postal Service provide “a maximum degree of effective and regular postal services to rural areas, communities, and small towns where post offices are not self-sustaining.” The Postal Service's view is that the "maximum degree" obligation in section 101(b) must be read in the context of related statutory provisions. It is a directive to recognize that special consideration must be given to the greater likelihood of dependence on postal retail facilities for access to postal products and services in rural communities and small towns; however, this concern must be balanced with Congressional mandates that the Postal Service execute its mission efficiently and economically. See sections 101(a); 403(a), (b)(1) and (b)(3); 404(d)(2) and 3661(a). Here, the Postal Service analyzed whether a maximum degree of effective and regular postal services to the Glenclyff area and community could be provided with rural delivery service in the absence of the Glenclyff Post Office, and the answer was affirmative.

The Postal Service determined that rural carrier service is more cost-effective than maintaining the Glenclyff Post Office. FD at 8-10. The Postal Service's estimates are supported by record evidence, in accordance with the Postal Service's statutory obligations. The Postal Service, therefore, has considered the economic savings to the

Postal Service resulting from such a closing, consistent with its statutory obligations and Commission precedent. See 39 U.S.C. § 404(d)(2)(A)(iv).

### **Effect on Employees**

As documented in the record, the impact on postal employees is minimal. The postmaster retired on May 2, 2010. A non-career employee from a neighboring office was installed as the temporary officer-in-charge (OIC). The non-career PMR serving as the OIC may be separated from the Postal Service, although attempts will be made to reassign the employee to a nearby facility. In fact, the administrative record indicates that upon the closing of the Glencliff Post Office, the OIC is slated to be returned to her administrative office, where she will retain her seniority and bidding rights. Item No. 15, Post Office Survey Sheet, at 1. The record shows that no other employee would be affected by this closing. FD at 9; Item No. 15, Post Office Survey Sheet, at 1; Item No. 33, Proposal, at 8. Therefore, in making the determination, the Postal Service considered the effect of the closing on the employees at the Glencliff Post Office, consistent with its statutory obligations. See 39 U.S.C. § 404(d)(2)(A)(ii).

### **Conclusion**

As reflected throughout the administrative record, the Postal Service has followed the proper procedures and carefully considered the effect of closing the Glencliff Post Office on the provision of postal services and on the Glencliff community, as well as the economic savings that would result from the proposed closing, the effect on postal employees, and other factors, consistent with the mandate of 39 U.S.C. § 404(d)(2)(A).

After taking all factors into consideration, the Postal Service determined that the advantages of discontinuance outweigh the disadvantages. In addition, the Postal Service concluded that after the discontinuance, the Postal Service will continue to provide a maximum degree of effective and regular service to Glenclyff customers. FD at 8. The Postal Service respectfully submits that this conclusion is consistent with and supported by the administrative record and is in accord with the policies stated in 39 U.S.C. § 404(d)(2)(A). The Postal Service's decision to close the Glenclyff Post Office should, accordingly, be affirmed.

The Postal Service respectfully requests that the determination to close the Glenclyff Post Office be affirmed.

Respectfully submitted,

**UNITED STATES POSTAL SERVICE**

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